

## UNITED STATES DISTRICT COURT

for the  
Middle District of North Carolina

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

INFORMATION ASSOCIATED WITH TIKTOK  
ACCOUNT "@jikewilliams" STORED AT PREMISES  
CONTROLLED BY TIKTOK INC.

Case No. 1:22MJ 438

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 115(a)(1)(B)	Threatening to assault or murder a Federal law enforcement officer with intent to impede, intimidate, or interfere, or with intent to retaliate against the officer
18 U.S.C. § 875(c)	Transmit in interstate commerce a communication with threat to injure a person

The application is based on these facts:

See attached Affidavit

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Max S. Wooten

Applicant's signature

Max S. Wooten, Task Force Officer, FBI

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 11/4/2022

  
Judge's signature

City and state: Winston-Salem, North Carolina

The Honorable Joi Elizabeth Peake, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Max S. Wooten, being duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I make this affidavit in support of an Application for a Search Warrant for information associated with TikTok account @jikewilliams (the "SUBJECT ACCOUNT") that is stored at premises owned, maintained, controlled, or operated by TikTok. TikTok Inc. is a social-networking company owned by Bytedance Ltd., whose United States headquarters is located in Culver City, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an Application for a Search Warrant under 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), to require TikTok to disclose to the government records and other information in its possession, including the contents of communications, pertaining to the subscriber or customer associated with the SUBJECT ACCOUNT.

2. Your affiant is employed as a Corporal with the Winston-Salem Police Department and has been so employed since August of 2004. Your Affiant is currently assigned to the Charlotte Division, Greensboro Resident Agency Office of the Federal Bureau of Investigation's (FBI) Joint Terrorism Task Force as a Task Force Agent (TFA). In this capacity, your Affiant is authorized to investigate matters involving violations of federal law. Your Affiant holds the Advanced Law Enforcement



Certificate issued by the North Carolina Criminal Justice Training and Education Standards Commission.

3. As a federal Task Force Agent, your Affiant is authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

4. Your Affiant has conducted and assisted with numerous investigations involving the commission of violent crimes, such as shootings, aggravated assaults, threatening communications, etc. Through instruction, training, experience, participation in investigations, and the exchange of information with other law enforcement, your Affiant has become familiar with the manner in which people commit these violent acts and the methods, language, and terms that are used to further their criminal activities.

5. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of your Affiant's knowledge about this matter.

6. Based on your Affiant's training and experience and the facts as set forth in this Affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 115(a) and 875(c) have been committed by Stephen Jike Williams. There is also probable cause to search the SUBJECT ACCOUNT for information described in

Attachment A for evidence of the se crimes and items to be seized listed in Attachment B.

### **JURISDICTION**

7. This court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. § 2703(a), (b)(1)(A), and (c)(1)(A). Specifically, the court is “a district court of the United States...that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

### **RELEVANT STATUTES**

8. 18 U.S.C. § 115(a)(1)(B) criminally punishes “Whoever . . . threatens to assault, kidnap, or murder . . . a Federal law enforcement officer . . . with intent to impede, intimidate, or interfere with such . . . law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such . . . law enforcement officer on account of the performance of official duties.”

9. 18 U.S.C. § 875(c) criminally punishes “Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another . . .”

## PROBABLE CAUSE

10. On September 19, 2022, an employee with The Good Information Foundation<sup>1</sup> saw and reported to law enforcement an email sent the prior day from Stephen Williams via email address jike7XXXX@gmail.com.<sup>2</sup> The title of the email was “Cease and desist all operations.” The body of the email reads as follows:

You are hereby ordered by we the people under the laws of the constitution to cease and desist all defamation and slander of Maga Republicans and Donald Trump. This is Treason an act of war and we will treat you accordingly. You have till the end of the month to print a retraction whistle blow on yourself or I will shut you down personally. Lethal action will be necessary if any physical detainment is attempted when I shut you down. Leave peacefully or your children will forget who you are.

11. After receiving the email, personnel with The Good Information Foundation provided the email to their attorney, J.B. After that, J.B. provided the email to Special Agent (SA) [REDACTED] of the Washington Field Office of the FBI. Based on the verbiage that lethal action would be taken if the business did not cease and desist all defamation and slander of MAGA<sup>3</sup> Republicans and Donald Trump, an investigative assessment was generated by SA [REDACTED] so further investigation could be

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<sup>1</sup> Based on my review of publicly available information, I know that the Good Information Foundation is a non-profit organization created in 2021 to “tackle the growing information crisis in America that is undermining social trust, harming public health, and damaging the United States democracy. The mission of The Good Information Foundation is to increase the flow of good, factual information that will counter and rebut the misinformation and disinformation.” See [goodinfofoundation.org](http://goodinfofoundation.org), last accessed on October 12, 2022.

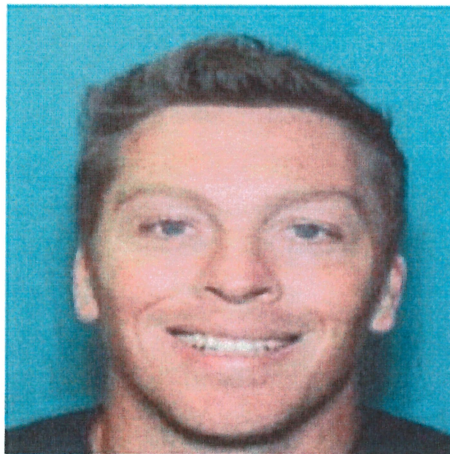
<sup>2</sup> This email has been partially redacted by using XXXX to mask some of the numbers in the email address, which appear to correspond with Stephen Jike Williams’s date of birth, to protect this personal identifiable information.

<sup>3</sup> MAGA is an abbreviation for “Make America Great Again,” the campaign slogan for Donald Trump’s successful 2016 presidential campaign.



done regarding the comments in the email and Williams's intent behind the comments.

12. Through law enforcement database searches, FBI personnel identified Stephen Jake Williams, date of birth X/XX/XXXX, residential address of 8303 Trottington Road, Stokesdale, North Carolina, as being the individual that sent the email.<sup>4</sup> FBI personnel also located the following photo for Williams in the North Carolina Department of Motor Vehicles database:



13. On or about September 23, 2022, after determining that Williams resides in North Carolina, the Washington Field Office of the FBI forwarded the investigative assessment to the Greensboro Resident Agency Office of the FBI for further investigation.

14. On October 3, 2022, a female Special Agent (SA) ("hereinafter "Special Agent 1") and a male FBI Task Force Officer (TFO) (hereinafter "TFO 1") of the FBI's

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<sup>4</sup> This Gmail account contains "Jake" in the email address, Williams's middle name, as well as his date of birth. Additionally, the contact detail with the email address was the name Stephen Williams.

Greensboro Resident Agency, who are both sworn federal law enforcement officers, attempted to interview Williams at his residence in Stokesdale, which is in Guilford County, within the Middle District of North Carolina. They were driving an unmarked vehicle and were not wearing any clothing with law enforcement markings. TFO 1 and Special Agent 1 planned to approach Williams's residence utilizing the front door and conduct a knock and talk interview. The front door was accessible by walking from the driveway along a concrete pathway to the front porch. TFO 1 and Special Agent 1 parked behind Williams's truck in the center of the driveway approximately 84 feet from the house. There were no gates or fences prohibiting entry on to Williams's property or driveway. There were no signs posted saying "No Trespassing."

15. Upon pulling into the driveway, Special Agent 1 and TFO 1 observed Williams exit his front porch and run towards TFO 1's vehicle. He immediately shouted, "Why the fuck are you on my property?" Special Agent 1 identified herself as an FBI agent with her credentials, which instantly made Williams very angry, and he began yelling that the Department of Justice and the FBI hired a Russian agent to steal the election. Williams screamed multiple times, "Get the fuck off my property!" TFO 1 identified himself as being with the Guilford County Sheriff's Office. Williams briefly turned his attention to TFO 1, but then refocused his attention back on Special Agent 1 and kept screaming and spitting<sup>5</sup> on her through the window of

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<sup>5</sup> Williams was screaming in such a manner and in close proximity to Special Agent 1, that particles of saliva landed on her as he was screaming at her. "Spitting" as used in this affidavit has that meaning.

TFO 1's vehicle. Special Agent 1 asked Williams why he was so upset, and all Williams would do was lean in the window of TFO 1's vehicle and scream. TFO 1 advised Williams to stop spitting on Special Agent 1. Williams stepped back and continued being irate and hostile.

16. Williams called Special Agent 1 a "bitch" multiple times and stated TFO 1 should arrest Special Agent 1 and have her executed for treason and sedition. Williams stated to Special Agent 1, "I'm going to take you out." TFO 1 asked Williams to clarify what he meant by that comment. He told TFO 1 that "you know what I meant." TFO 1 advised if he was threatening to kill or harm a federal agent, he would be charged for threatening a federal agent. Williams failed to explain whether he meant something other than killing or harming the federal agent and instead asked if Special Agent 1 or TFO 1 had a search warrant. TFO 1 and Special Agent 1 advised they did not have a search warrant, and Williams again said, "get the fuck off of my property!" Williams continued screaming "Get the fuck off my property." Special Agent 1 and TFO 1 then left Williams's residence without conducting an interview regarding Williams's threat of lethal action in the email received by The Good Information Foundation (*see supra* Paragraph 10).

17. On October 6, 2022, Special Agent 1 called [REDACTED] of The Good Information Foundation and advised her that Williams was not interviewed due to his irate behavior. During their conversation, Special Agent 1 learned that Williams's email to The Good Information Foundation was in response to a TikTok video made by a social media influencer that was asked by The Good Information Foundation to



produce anti-Trump rhetoric. In the video, the influencer exposed that The Good Information Foundation was paying influencers to post videos and requiring them to use preestablished talking points, one of which the representative of the Foundation could not provide any factual support for. [REDACTED] told Special Agent 1 that The Good Information Foundation hired an outside company to hire social media influencers to create videos that aligned with their information and beliefs about former President Donald Trump. [REDACTED] advised Special Agent 1 that The Good Information Foundation received multiple emails in response to the TikTok video, but Williams's email was the most egregious.

18. On October 7, 2022, the FBI National Threat Operations Center (NTOC) received a submission from a complainant named J.K. J.K. reported that they had observed a TikTok video in which a male subject was threatening to kill FBI agents. J.K. provided NTOC personnel a link to the TikTok video, and advised the video was posted approximately 17 hours before J.K. observed it. The link was uploaded to the investigative assessment already being investigated by the Greensboro Resident Agency of the FBI.

19. On October 8, 2022, Special Agent 1 contacted J.K. by phone about the TikTok video. J.K. resides outside the state of North Carolina. J.K. indicated they were very disturbed by the video and provided Special Agent 1 a screenshot from the video that showed the TikTok username to be "@jikewilliamsofficial."<sup>6</sup> The screenshot

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<sup>6</sup> A federal search warrant was obtained in 1:22MJ417-1, for certain content and subscriber information from the @jikewilliamsofficial TikTok account. The Affiant has not yet received returns from TikTok for this warrant. As detailed in the affidavit

clearly indicated the video J.K. was referring to was a video containing the threats made by Williams, which is described in the next paragraph.

20. On October 9, 2022, Special Agent 1 provided TikTok Inc. a preservation letter for the TikTok video posted by Williams. Your Affiant, along with other FBI personnel, reviewed the video and determined that Williams had posted a TikTok video regarding the encounter with the FBI on October 3, 2022. The video is entitled “Fuck the FBI.” Williams said, “The FBI showed up at my house the other day, Monday, a female agent along with a Sheriff.” Williams proceeded to make statements about how the FBI is corrupt, and all agents are considered to be “enemy combatants.” The video lasted two minutes and eighteen seconds. The video appeared to be filmed in the living room of a residence. In the video, Williams made the following relevant statements in substance and in part:

FBI showed up at my house the other day, Monday. Female agent along with a sheriff—not packing like that—um, didn’t have a warrant, asking me questions about e-mails that I sent . . . .

. . .

The FBI, at this point in time, has no jurisdiction. If they come to your home, point your weapon at them, open fire on them, and take them out. They are enemy combatants. By the Constitution, they are enemy combatants.

. . .

Wake up America. Listen, if the FBI—I told the FBI, if you come back, come hot. And if they try to surround my house like that, you tell that fat son of a bitch, Boy, you’re a big fucking target. I got a fucking .308.<sup>7</sup>

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below, this account was apparently suspended by TikTok, at which point Williams began posting from the @jikewilliams account which is the subject of this search warrant application.

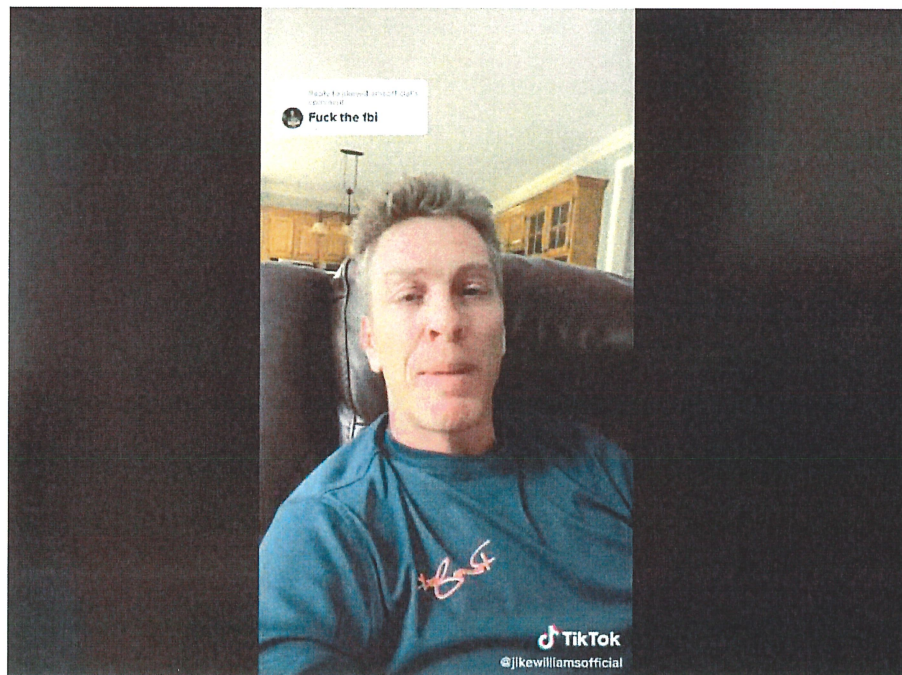
<sup>7</sup> Here, .308 appears to refer to a .308 caliber rifle. .308 caliber ammunition is commonly used in applications including military, law enforcement, competitive sport

I'll take that AK-47 from you when I'm done and use it to kill the rest of those motherfuckers and make it look like you did it.

I'm not playing with the fucking FBI. They've been put on fucking notice, if you step back foot on my fucking property, I ain't gonna sit there and talk to you. I'm going to bust your fucking head open with fucking .308s man. I'm going to kill every single one of you, stack you up in your cars and drive you back to headquarters and finish the fucking job.

Fuck the FBI. They are working with foreign agents, they are a corrupt organization, they have no jurisdiction, they have thrown us into basically World War III. We are literally now, at the precipice of World War III with Russia because of their corruption, their failure to investigate corruption, and they are complicit with the death of Ukrainians, of the United States Americans who are going over there and getting killed. They are absolutely out of control. Stand up to em, fight em, shoot em on sight.

21. Below is a screenshot from the video, clearly showing the subject in the video is Stephen Jike Williams.



shooting, and hunting. This caliber is commonly used in rifles for long-range precision shooting.



22. TFO 1 reviewed the video, specifically the statements where Williams referred to a “fat son of a bitch” and “Boy, you’re a big fucking target.” TFO 1 was not sure who Williams was referring to since Williams’s threats were primarily directed at FBI agents and TFO 1 identified himself as a sheriff’s deputy.

23. On October 13, 2022, your Affiant located two TikTok videos posted by Williams utilizing username @jikewilliamsofficial. One video was titled “You’re 100% right.” The other video was titled “no they don’t. it’s irresponsible and unsportsmanlike, the chance of wounding is way too high.” The following are details related to each video:

**a. Video “You’re 100% right”:**

This TikTok video shows Williams speaking in the living room of a residence, and the video appears to have been recorded in response to a comment posted by username domicky; however, that comment was not accessible. According to a timeline on the bottom portion of the screen, the video was posted two days prior, on October 11, 2022. In Williams’s video, he agreed with what was said in the other video regarding the FBI. Williams said the FBI was at his house “last Monday, eight days ago.” He stated the FBI did not know he had a fiancée but thought he was a single white male living in poverty, because he reduced his salary. Williams stated the FBI “came out with a female agent and a county sheriff, and they came out unarmed, which was their first mistake.” Williams said he “punked” the FBI, “stood them down,

kicked them out of the yard,” told the FBI not to ever come back, and accused them of treason, sedition, and conspiracy to overthrow the government.

**b. Video “no they don't. it's irresponsible and unsportsmanlike, the chance of wounding is way too high”:**

This video shows Williams speaking in what appears to be a garage area of a residence, and he is replying to a comment made by username 383obs1998. Your Affiant did not view that comment.<sup>8</sup>

It appears Williams was criticizing viewers for their criticism of a previous TikTok video related to long-range shooting. In Williams’s video, he states the person in the original shooting video was probably shooting a .338, not a .308. Williams stated, “you better watch your mouth, I've trained with guys like this dude” (referring to the original shooting video) and “he can shoot better than you, he can shoot better than me.” Based on Williams’s comments in the video, Williams has training and knowledge of firearms.

24. On or about October 24, 2022, your Affiant observed another TikTok video posted by Williams. Your Affiant did not recall the name of the video, but while reviewing it, your Affiant heard Williams state (paraphrased) that the FBI was corrupt. He further stated that he did not want another “1776” but only wanted peace. Your Affiant attempted to download the video on October 31, 2022; however,

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<sup>8</sup> The timeline on the bottom portion of the screen indicated the video was posted 3 days ago; however, your Affiant did not capture a screenshot until October 14. Therefore, this video appears to have been posted the same day as the other video, October 11.

your Affiant could not locate the video, most likely due to Williams' account being suspended by TikTok.

25. On October 31, 2022, your Affiant reviewed other TikTok videos posted by Williams to determine if Williams had made any additional threats towards the FBI or other law enforcement personnel. Your Affiant located a video posted by Williams utilizing account @jikewilliams. The video was titled "On the back of you money the the pyramid the saying underneath it says "new world order" and the eye on top of the pyramid is for the Secret society." The video was posted two days prior, October 29, 2022. In the video, Williams stated he was in his garage. He stated his accounts had been banned and the FBI came to his house on October 3rd. He then preceded to make the following threatening comments in substance and in part:

Listen to me. Stand fucking strong. Pull out your fucking weapons. Fight your federal agents. They left my home. Nobody died. Thank God. Thank God. But I stood'em down. And listen y'all, it's like this. These people wanna come over here and start fucking problems with people like me who was just telling the truth, like this lady. They say I'm crazy, right. [(The camera pans to a table that has something black in color lying on it.)] I'm not fucking crazy, I'm ready for a fucking fight. And I'm not ready to fucking go to Ukraine and fight Russia. I'm ready to shoot fucking FBI agents, CIA agents, and any federal law enforcement agent working for Joe Biden or anybody like Klaus Schwab . . . Australian police, any of them. Execute those motherfuckers on sight. If they wanna fucking de-populate, de-populate *them*.

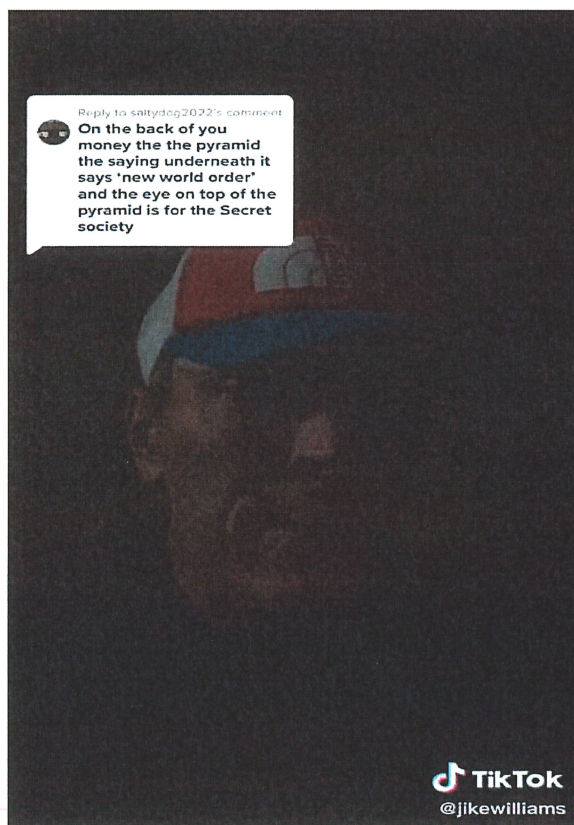
You fu— . . . I-I-I love y'all on this TikTok shit, whatever, but they're gonna censor the truth. They're gonna shut you down. You're . . . you sound like you're in Europe. What the fuck is the CEO of Pfizer still doing fucking breathing? If I was in a hundred—a thousand yards of that motherfucker, he'd be spitting his fucking teeth out of his mouth. Cause I would shoot him with a three-oh-eight (.308) in the fucking mouth. TikTok is promoting vaccinations, which is death. But they won't—they won't let you—they won't let you put this motherfucker on here. Right? [(Williams holds what appears to be a handgun in a holster up to the camera.)] They won't let you pull—pull this this motherfucker



out [(Williams picks up what appears to be a magazine for a semi-automatic rifle and holds it up to the camera)] and the rifles that are in my fucking— . . . they won't let me show you that, but they'll show you a fucking syringe that kills little kids in their sleep.

They wanna take away our weapons. They wanna take away our ability to communicate. And they wanna do it and they wanna watch y'all bitch and complain and watch me bitch and complain so they know where we're at when it's time to purge us. So, you damn well better start gettin' your fucking weapons ready, start calling your fucking government like I do . . . tell them motherfuckers where they can stick it, and dare'em to fucking bring a fight. And kill every fucking one of em that you can. Cause we should've did that to the Nazis in 1938, and we didn't. And a hundred million people died. Should've killed Hitler as soon as he took Munich. But you're fucking cowards and you're TikTok. Fucking fight man. Fight!

26. On October 31, 2022, your Affiant provided TikTok a preservation request for account @jikewilliams. Below is a screenshot from the aforementioned video:



27. From your Affiant's working knowledge of TikTok, the TikTok Law Enforcement Data Request Guidelines, and from other investigations, your Affiant is aware of the following about TikTok and about the information collected and retained by TikTok:

- a. TikTok owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.tiktok.com>. TikTok allows its users to create their own profile pages, which can include a vanity name, a photo of themselves, and other information. Users can access TikTok through the TikTok website or by using a special electronic application ("app") created by the company that allows users to access the service through a mobile device.
- b. TikTok accounts are identified solely by username or account identifier. Approved identifiers include TikTok User ID, TikTok username, phone number, email address, and/or Video ID. TikTok is unable to locate accounts based on the real name, email address, phone number, or other account information associated with the TikTok user/account.
- c. TikTok permits users to post videos to their profiles on TikTok and share videos with others on TikTok and other social media platforms. When creating and posting a video on TikTok, a user can edit the video by adding music, adding their own sound, controlling the playback speed, and applying a variety of "filters" or other visual effects that modify the look of the posted videos. In addition, TikTok allows users to make

comments on posted videos, including videos that the user posts or videos posted by other users of TikTok. Users can also "like" videos.

- d. Upon creating a TikTok account, a user must create a unique TikTok username and an account password. TikTok asks users to provide basic identity and contact information upon registration and also allows users to provide additional identity information for their user profile. This information may include the user's full name, email address, and phone number, as well as potentially other personal information provided directly by the user to TikTok. Once an account is created, users may also adjust various privacy and account settings for the account on TikTok.
- e. For each user, TikTok also collects and retains information called "Log Data," which includes logs which may include meta-data regarding account logins and logouts, user generated content, and in-app communications.
- f. TikTok videos created by users may be saved privately ("Private Videos") or posted to the TikTok app and made available to registered users ("Public Videos"). TikTok maintains information related to Private Videos and Public Videos that have been deleted. Public Videos that are available through the TikTok website or app, since they are publicly available, are not provided to law enforcement pursuant to legal process.



28. As explained herein, information stored in connection with a TikTok account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In your Affiant's experience and knowledge from other investigations, a TikTok user's account activity, IP logs, stored electronic communications, and other data retained by TikTok, can indicate who has used or controlled the TikTok account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, direct messaging logs, and shared videos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the TikTok account at a relevant time. Further, TikTok account activity can show how and when the account was accessed or used. For example, as described herein, TikTok logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of TikTok access, use, and events relating to the crime under investigation. Last, TikTok account activity may provide relevant insight into the TikTok account owner's state of mind as it relates to the offense under investigation. For example, information on the TikTok account may indicate the

owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

29. Based on the information above, the computers of TikTok are likely to contain all the material described above with respect to the SUBJECT ACCOUNT, including stored electronic communications and information concerning subscribers and their use of TikTok, such as account access information, which would include information such as the IP addresses and devices used to access the account, as well as other account information that might be used to identify the actual user or users of the account at particular times. Specifically, your Affiant believes the computers of TikTok maintain the October 29, 2022 video of Stephen Williams threatening federal agents and can provide this video upon execution of this Search Warrant.

#### **INFORMATION TO BE SEARCHED AND ITEMS TO BE SEIZED**

30. Your Affiant anticipates executing this warrant under the Electronic Communications Privacy Act, in particular Title 18, United States Code, Sections 2703(a), (b)(1)(A), and (c)(1)(A), by using the warrant to require TikTok to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section 1 of Attachment B. Upon receipt of the information described in Section 1 of Attachment B, government-authorized persons will review that information to locate the items described in Section 2 of Attachment B.

### CONCLUSION

31. Based on the above, your Affiant has probable cause to believe that Stephen Jike Williams, communicated, via TikTok, threats to kill FBI agents, specifically in response to the attempted interview on October 3, 2022. Based on the aforementioned factual information, your Affiant respectfully submits there is probable cause to believe that evidence, fruits, and instrumentalities of violations, or attempted violations, of 18 U.S.C. §§ 115(a)(1)(B) and 875(c) may be located in the SUBJECT ACCOUNT described in Attachment A.

32. Based on the forgoing, your Affiant requests that the Court issue the proposed search warrant.

33. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on TikTok. Because the warrant will be served on TikTok, who will then compile the requested records at a time convenient to it,




there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,

/s/ Max S. Wooten  
Max S. Wooten  
Task Force Officer  
Federal Bureau of Investigation

Sworn to, attested to, or affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 4 day of November, 2022.

  
Joi Elizabeth Peake  
United States Magistrate Judge

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information associated with the TikTok account with username: “@jikewilliams” that is stored at premises owned, maintained, or operated by TikTok Inc., a company that is owned by Bytedance, Ltd., with a U.S. headquarters in Culver City, California.

## ATTACHMENT B

### PARTICULAR THINGS TO BE SEIZED

#### **I. Information to be disclosed by TikTok Inc.**

To the extent that the information described in Attachment A is within the possession, custody, or control of TikTok Inc., including any messages, records, files, logs, or information that have been deleted but are still available to TikTok Inc., or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f) on October 31, 2022, TikTok Inc., is required to disclose the following information to the government for each account listed in Attachment A:

- a. All identity and contact information, including full name, e-mail address, physical address (including city, state, and zip code), date of birth, phone numbers, gender, hometown, occupation, and other personal identifiers;
- b. All past and current usernames associated with the account;
- c. Account names and identifiers for any and all social media accounts linked to the requested accounts;
- d. The dates and times at which the account and profile were created, and the Internet Protocol ("IP") address at the time of sign-up;
- e. All activity logs including IP logs and other documents showing the IP address, date, and time of each login to the account, as well as any other log file information;



- f. All information regarding the particular device or devices used to login to or access the account, including all device identifier information or cookie information, including all information about the particular device or devices used to access the account and the date and time of those accesses;
- g. All data and information associated with the profile page, including photographs, "bios," and profile backgrounds and themes;
- h. All communications or other messages sent or received by the account from October 3, 2022 to November 3, 2022;
- i. All user content created, uploaded, or shared by the account, including any comments made by the account on videos or other content from October 3, 2022 to November 3, 2022;
- j. All Private Videos and deleted videos for the account from October 3, 2022 to November 3, 2022;
- k. All location data associated with the account, including geotags from October 3, 2022 to November 3, 2022;
- l. All data and information that has been deleted by the user from October 3, 2022 to November 3, 2022;
- m. All privacy and account settings;
- n. All records of TikTok searches performed by the account, including all past searches saved by the account from October 3, 2022 to November 3, 2022;

- o. All information about connections between the account and third-party websites and applications; and,
- p. All records pertaining to communications between TikTok and any person regarding the user or the user's TikTok account, including contacts with support services, and all records of actions taken, including suspensions of the account.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence, and/or instrumentalities of violations of 18 U.S.C. §§ 115(a)(1)(B) and 875(c) involving Stephen Jike Williams from October 3, 2022 to November 3, 2022, for each username identified on Attachment A, in the form of:

- a. Videos, posts, comments, or other electronic communications related to threats, including those communications directed towards FBI agents, and a video titled "On the back of you money the the pyramid the saying underneath it says 'new world order' and the eye on top of the pyramid is for the Secret society";
- b. Evidence indicating how and when the TikTok account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the TikTok account owner or user;
- c. Evidence indicating the TikTok account owner's or user's state of mind as it relates to the crimes under investigation, such as direct or

circumstantial evidence that the owner or user of the account had the intent to impede, intimidate, or interfere with FBI agents' performance of official duties, or had the intent to retaliate against FBI agents for performance of official duties;

- d. The identity of the person(s) who created or used the username, including records that help reveal the whereabouts of such person(s);
- e. The identity of the person(s) who communicated threats toward FBI agents; and
- f. Account subscriber and registration information.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.